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March 23, 2001

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

Cheryl L. Parrino
Chief Executive Officer
Universal Service Administrative Corp.
2120 L St., N.W., Suite 600
Washington, D.C. 20037

**Re: Federal-State Joint Board on Universal Service,
CC Docket No. 96-45**

Dear Ms. Salas and Ms. Parrino:

On behalf of Western Wireless Corp. and its wholly-owned subsidiary, WWC Holding Co., Inc. (collectively, "Western Wireless"), I am enclosing the Declaration of Gene DeJordy, Vice President, Regulatory Affairs. Mr. DeJordy certifies that Western Wireless will use all universal service funding that it receives for the state of Wyoming only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.313.

Carriers that are not subject to rate regulation by state commissions "may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission." *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999). Consistent with this directive, Western Wireless has submitted the attached Declaration to the Wyoming Public Service Commission to facilitate the state's certification pursuant to 47 C.F.R. § 54.313.

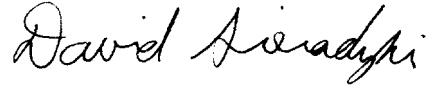
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Magalie Roman Salas
Cheryl Parrino
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If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in cursive script, reading "David L. Sieradzki".

David L. Sieradzki
Counsel for Western Wireless

Enclosures

cc: Denise Parrish, Wyoming PSC
Katherine Schroder, FCC
Anita Cheng, FCC
Richard Smith, FCC
Irene Flannery, USAC
Robert Haga, USAC

DECLARATION OF GENE DEJORDY

1. My name is Gene DeJordy. My title is Vice President, Regulatory Affairs, Western Wireless Corporation. My business address is 3650 – 131st Ave., S.E., Suite 400, Bellevue, Washington 98006, and my business telephone number is (425) 586-8055.

2. WWC Holding Co., Inc., a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was recently designated as an eligible telecommunications carrier (“ETC”) in portions of the state of Wyoming, for purposes of receiving federal universal service support. *See Federal-State Joint Board on Universal Service; Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, DA 00-2896 (Common Carrier Bureau, released Dec. 26, 2000) (“ETC Order”).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost

support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has not yet launched its universal service offering in Wyoming. Because the company has not yet launched its universal service offering, it does not currently have any universal service customers and, therefore, the company will not be reporting loop counts to the Universal Service Administrative Company for the purpose of receiving federal high-cost support.

5. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Wyoming only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

6. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage and an expanded local calling area. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Wyoming, which range from \$14.99 per month plus 65 cents per

minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

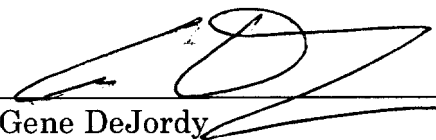
7. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: the wireless local loop ("WLL") units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

8. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of

additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

9. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e), and the Commission should file a certification letter to that effect pursuant to 47 C.F.R. § 54.313.

I declare under penalty of perjury that the foregoing is true and correct.


Gene DeJordy